

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	

**CERTIFICATION OF COUNSEL REGARDING
CONFIDENTIALITY AGREEMENT AND STIPULATED PROTECTIVE ORDER**

The undersigned proposed counsel to the above captioned debtors and debtors in possession hereby certifies the following:

1. On January 15, 2025 (the “Petition Date”), JOANN Inc. and certain of its affiliates (collectively, the “Debtors”) filed voluntary petitions for relief in the United States Bankruptcy Court for the District of Delaware (the “Court”) under title 11 of the United States Code, §§ 101–1532.

2. On January 28, 2025, the Office of the United States Trustee for the District of Delaware filed the *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 198] appointing the Official Committee of Unsecured Creditors (the “Committee”) in these chapter 11 cases.

3. The Debtors, the Committee and certain beneficial holders or the investment advisors or managers for certain beneficial holders (collectively, the “Ad Hoc Term Loan Group”),

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

1903P Loan Agent, LLC, and Bank of America, N.A. have entered into a *Confidentiality Agreement and Stipulated Protective Order* (the “Confidentiality Agreement and Protective Order”) that will, subject to Court approval, govern the exchange and use of confidential information between the Debtors, the Committee, certain of the Debtors’ creditors and other constituents that are signatories to the Confidentiality Agreement and Protective Order, and any other persons or entities who become bound by the Confidentiality Agreement and Protective Order.

4. Attached hereto as **Exhibit A** is a proposed form of order (the “Proposed Order”) approving the Confidentiality Agreement and Protective Order. The Confidentiality Agreement and Protective Order is attached as Annex 1 to the Proposed Order.

5. The Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

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Dated: February 25, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

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